

November 15, 2019

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

**Re: Joint Petition to Pause Implementation of December 2019 Lifeline Minimum Service Standards Pending Forthcoming Marketplace Study; WC Docket Nos. 11-42, 09-197 and 10-90.**

Dear Ms. Dortch:

Public Knowledge urges the Commission to grant the Joint Petition to Pause Implementation of December 2019 Lifeline Minimum Service Standards Pending Forthcoming Marketplace Study (“Petition”) filed by CTIA, National Consumer Law Center, National Hispanic Media Coalition, OCA – The Asian Pacific American Advocates, and the United Church of Christ.<sup>1</sup> The Petition requests the Commission pause the minimum service standard increases and voice phase-out set to take effect on December 1, 2019, and study the Lifeline marketplace. Granting the Petition is the best outcome for consumers. The Lifeline service providers have endorsed the Petition’s proposal to move up the State of the Lifeline Marketplace Report from June 2021 for this purpose.<sup>2</sup>

However, if the Commission is not inclined to grant the Petition at this time, the Commission should choose an alternative path that gives consumers choices for the \$9.25 per month in support and retains full support for Lifeline voice services.<sup>3</sup> Providing consumers options at that are sustainable at the \$9.25 price point best serves the public interest and protects low-income families by allowing Lifeline subscribers to choose the type of service that best meets their needs, including voice service. This path will continue to encourage participation in the

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<sup>1</sup> Joint Petition to Pause Implementation of December 2019 Lifeline Minimum Service Standards Pending Forthcoming Marketplace Study, WC Docket Nos. 11-42, 09-197, 10-90 (June 27, 2019) (“Petition”).

<sup>2</sup> See National Lifeline Association and Q Link Wireless LLC *Ex Parte* Presentation, WC Docket Nos. 17-287, 11-42, 09-197 and 10-90 at 3 (filed Nov. 6, 2019); TracFone Wireless, Inc. *Ex Parte* Presentation, WC Docket Nos. 11-42, 09-197, 10-90 at 6 (filed Oct. 30, 2019).

<sup>3</sup> See National Consumer Law Center, National Hispanic Media Coalition, OCA – The Asian Pacific American Advocates, and United Church of Christ, OC, Inc. *Ex Parte* Presentation, WC Docket Nos. 17-287, 11-42, 09-197 and 10-90 at 1 (filed Nov. 13, 2019) (“we reject any proposal that reduces the level of voice-only support without a proper survey of the marketplace”). For example, Prepaid Wireless Group and Global Connection Inc. have proposed full support for 3,000 minutes. See Prepaid Wireless Group and Global Connection Inc. *Ex Parte*, WC Docket Nos. 17-287, 11-42, 09-197, 10-90 (filed Nov. 8, 2019).

Lifeline program by a wide array of service providers, which gives consumers choices, promoting competition and improved service quality.

If the Commission does not grant the Petition, it should opt for a plan that retains support for voice service, provides a minimum service standard of 2 GB plus 1,000 minutes per month for a voice/data bundle, and provides a data-only option with a minimum of 3 GB mobile broadband per month. Adopting this plan would give consumers an additional option that is more likely to be useful for low-income consumers who overwhelmingly prefer voice and broadband bundles.

In accordance with Section 1.1206(b) of the Commission's rules, this letter is being filed with your office. If you have any further questions, please contact me at (202) 861-0020.

Respectfully submitted,

/s/ Phillip Berenbroick

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